

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re: THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, as representative of THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i> Debtors. ¹	PROMESA Title III Case No. 17 BK 3283-LTS (Jointly Administered)
In re: THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO as representative of PUERTO RICO ELECTRIC POWER AUTHORITY, Debtor.	PROMESA Title III Case No. 17 BK 4780-LTS
THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, as representative of PUERTO RICO ELECTRIC POWER AUTHORITY, and PUERTO RICO FISCAL AGENCY AND FINANCIAL ADVISORY AUTHORITY, Movants, v. OFFICIAL COMMITTEE OF UNSECURED CREDITORS, <i>et al.</i> Respondents.	This Court Filing Relates Only to Case No. 17-BK- 4780-LTS

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the "Commonwealth") (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA", and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the "Debtors") (Bankruptcy Case No. 19-BK-5532-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

**URGENT MOTION OF ALL PARTIES TO ENTER A CORRECTED
FIFTH REVISED ORDER EXTENDING AND ESTABLISHING CERTAIN
DEADLINES APPLICABLE TO THE JOINT MOTION OF PUERTO RICO ELECTRIC
POWER AUTHORITY AND AAFAF PURSUANT TO BANKRUPTCY CODE
SECTIONS 362, 502, 922, AND 928, AND BANKRUPTCY RULES 3012(A)(1) AND 9019
FOR ORDER APPROVING SETTLEMENTS EMBODIED IN THE RESTRUCTURING
SUPPORT AGREEMENT [ECF NO. 1235]**

To the Honorable United States District Judge Laura T. Swain:

The Puerto Rico Electric Power Authority (“PREPA”), by and through the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as the Debtors’ representative pursuant to section 315(b) of the Puerto Rico Oversight, Management, and Economic Stability Act (“PROMESA”), the Puerto Rico Fiscal Agency and Financial Advisory Authority (“AAFAF,” and together with PREPA and the Oversight Board, the “Government Parties”), The Official Committee of Unsecured Creditors (the “UCC”), Cortland Capital Market Services LLC, as Administrative Agent (“Cortland”), SOLA LTD, Solus Opportunities Fund 5 LP, Ultra Master LTD, and Ultra NB LLC (collectively, “Solus” and together with Cortland, the “FLL”), Unión de Trabajadores de la Industria Eléctrica y Riego (“UTIER”), and Sistema de Retiro de los Empleados de la Autoridad de Energía Eléctrica (“SREAEE,” together with the UCC, the FLL, and UTIER, the “Anticipated Objectors”)² (collectively, the “Parties”) respectfully submit this urgent joint motion (the “Urgent Motion”) with the attached proposed order in connection with the *Joint Motion of Puerto Rico Electric Power Authority and AAFAF Pursuant to Bankruptcy Code Sections 362, 502, 922, and 928, and Bankruptcy Rules 3012(a)(1) and 9019 for Order Approving Settlements Embodied in Restructuring Support Agreement* [the “RSA”] and

² In referring to the Anticipated Objectors, the Government Parties do not concede that any Anticipated Objector has standing to object to the 9019 Motion or to intervene in this contested matter. The Fee Examiner has also indicated that he is considering filing an objection. The Government Parties do not anticipate that U.S. Bank National Association as the PREPA Bond Trustee will oppose the 9019 Motion, but it has reserved all rights relating to the 9019 Motion at this time. The Government Parties reserve their rights to oppose participation by any of these entities, as appropriate.

Tolling Certain Limitations Periods (ECF No. 1235 in Case No. 17-4780). A copy of the proposed order is attached hereto as **Exhibit A** (the “Proposed Order”).

The Parties are submitting herewith a corrected version of *[Proposed] Fifth Revised Order Modifying Certain Deadlines Applicable to the Joint Motion of Puerto Rico Electric Power Authority and AAFAF Pursuant to Bankruptcy Code Sections 362, 502, 922, and 928, and Bankruptcy Rules 3012(A)(1) and 9019 for Order Approving Settlements Embodied in the Restructuring Support Agreement* (the “Original Proposed Order”) (ECF No. 1664 in Case No. 17-4780), which the Court recently entered (ECF No. 1667 in Case No. 17-4780). An additional edit, agreed to by all Parties, was inadvertently left off the Original Proposed Order. A blackline comparison of the Original Proposed Order and the corrected Proposed Order is attached hereto as **Exhibit B**. The Parties respectfully request the Court enter the Proposed Order attached as Exhibit A, superseding ECF No. 1667 in Case No. 17-4780.

* * *

**Certification of Compliance with
Local Rule 9013-1 and the Tenth Amended Case Management Procedures**

Pursuant to Local Rule 9013-1 and ¶ I.H of the *Tenth Amended Notice, Case Management and Administrative Procedures*, the undersigned counsel hereby certify they have (a) carefully examined the matter and concluded there is a true need for an urgent extension; (b) not created the urgency through any lack of due diligence; and (c) made reasonable, good-faith communications in an effort to resolve or narrow the issues that are being brought to the Court.

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Dated: October 17, 2019

PROSKAUER ROSE, LLP

/s/ Martin J. Bienenstock

Martin J. Bienenstock
Ehud Barak
Margaret A. Dale
Gregg M. Mashberg
Eleven Times Square
New York, NY 10036-8299
Tel: (212) 969-3000
Fax: (212) 969-2900
mbienenstock@proskauer.com
ebarak@proskauer.com
mdale@proskauer.com
gmashberg@proskauer.com

-and-

Paul V. Possinger
70 W. Madison St., Suite 3800
Chicago, IL 60602
Tel: (312) 962-3550
Fax: (312) 962-3551
ppossinger@proskauer.com

-and-

**DEL VALLE EMMANUELLI LAW
OFFICES**

Luis F. del Valle Emmanuelli
PO Box 79897
Carolina, PR 00984-9897
Tel: (787) 977-1932
Fax: (787) 722-1932
devlawoffices@gmail.com

*Attorneys for The Financial Oversight
and Management Board for Puerto Rico,
as representative of The Commonwealth
of Puerto Rico and the Puerto Rico
Electric Power Authority*

Respectfully submitted,

O'MELVENY & MYERS LLP

/s/ Elizabeth L. McKeen

John J. Rapisardi
Nancy A. Mitchell
7 Times Square
New York, NY 10036
Telephone: (212) 326-2000
Facsimile: (212) 326-2061
Email: jrapisardi@omm.com
nmitchell@omm.com

-and-

Peter Friedman
1625 Eye Street, NW
Washington, DC 20006
Telephone: (202) 383-5300
Facsimile: (202) 383-5414
Email: pfriedman@omm.com

-and-

Elizabeth L. McKeen
Ashley M. Pavel
610 Newport Center Drive, 17th Floor
Newport Beach, CA 92660
Telephone: (949) 823-6900
Facsimile: (949) 823-6994
Email: emckeen@omm.com

*Attorneys for the Puerto Rico Fiscal
Agency and Financial Advisory
Authority and Puerto Rico Electric Power
Authority*

MARINI PIETRANTONI MUÑIZ, LLC

/s/ Luis C. Marini-Biaggi

Luis C. Marini-Biaggi
USDC 222301
250 Ponce de León Ave., Suite 900
San Juan, Puerto Rico 00918
Tel.: (787) 705-2171
Email: lmarini@mpmlawpr.com

*Co-counsel for the Puerto Rico Fiscal
Agency and Financial Advisory
Authority*

DÍAZ & VÁZQUEZ LAW FIRM, P.S.C.

/s/ Katuska Bolaños-Lugo

Katuska Bolaños-Lugo
USDC No. 231812
290 Jesús T. Piñero Ave. Scotiabank Tower,
Suite 11-E San Juan, PR 00918
PO Box 11689 San Juan, PR 00922-1689
Tel: (787) 458-8276
Cel. (787) 458-8276
Email: kbolanos@diazvaz.law

*Co-counsel for Puerto Rico Electric Power
Authority*

**SIMPSON THACHER & BARTLETT
LLP**

/s/ Nicolas Baker

Bryce L. Friedman (admitted *pro hac vice*)
Nicholas Baker (admitted *pro hac vice*)
Sarah E. Phillips (*pro hac* pending)
425 Lexington Avenue
New York, NY 10017
bfriedman@stblaw.com
nbaker@stblaw.com
sarah.phillips@stblaw.com

*Counsel for SOLA LTD, Solus Opportunities
Fund 5 LP, Ultra Master LTD, and Ultra NB
LLC*

WACHTELL, LIPTON, ROSEN & KATZ

/s/ Emil A. Kleinhaus

Richard G. Mason, Esq.
Amy R. Wolf, Esq.
Emil A. Kleinhaus, Esq.
Angela K. Herring, Esq.
51 West 52nd Street
New York NY 10019
rgmason@wlrk.com
arwolf@wlrk.com
eakleinhaus@wlrk.com
akherring@wlrk.com

*Counsel for Cortland Capital Market Services
LLC, as Administrative Agent*

PAUL HASTINGS LLP

/s/ Luc A. Despins

Luc A. Despins, Esq.
Andrew V. Tenzer, Esq.
James R. Bliss, Esq.
James B. Worthington, Esq.
Michael E. Comerford, Esq.
G. Alexander Bongartz, Esq.
Nicholas Bassett, Esq.
875 15th Street NW
Washington, DC 20005
lucdespins@paulhastings.com
andrewtenzer@paulhastings.com
jamesbliss@paulhastings.com
jamesworthington@paulhastings.com
michaelcomerford@paulhastings.com
alexbongartz@paulhastings.com
nicholasbassett@paulhastings.com

*Counsel for the Official Committee of
Unsecured Creditors*

BUFETE EMMANUELLI, C.S.P.

/s/ Rolando Emmanuelli Jiménez

Rolando Emmanuelli Jiménez
1st Cir. #7707
USDC: 214105

Jessica E. Méndez Colberg
1st Cir. # 1185272
USDC: 302108

rolando@bufete-emmanuelli.com
jessica@bufete-emmanuelli.com
notificaciones@bufete-emmanuelli.

*Counsel for Unión de Trabajadores la
Industria Eléctrica y Riego (UTIER), and
Sistema de Retiro de los Empleados de la
Autoridad de Energía Eléctrica (SREAEE)*

CERTIFICATE OF SERVICE

I hereby certify that, on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notifications of such filing to all CM/ECF participants in this case.

/s/ Luis F. del Valle-Emmanuelli
Luis F. del Valle-Emmanuelli